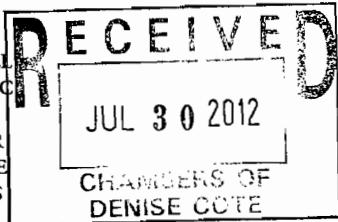


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July 27, 2012

MEMO ENDORSED

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

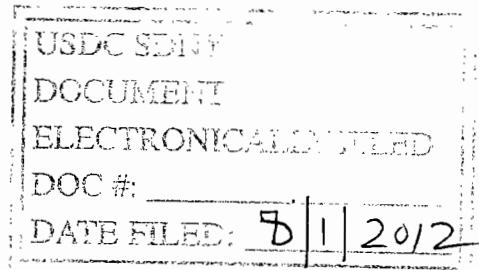
Re: *United States v. Zubair Tahir,*
10 Cr. 923 (DLC)

Dear Judge Cote:

This letter is submitted on behalf of Zubair Tahir, whom I represent in the above-captioned action by CJA appointment, regarding a request for a bail modification. Mr. Tahir's bail presently permits him to travel only within the Southern and Eastern Districts of New York, and the District of New Jersey, and he was required to surrender his passport. He respectfully requests permission to travel to Ontario, Canada to visit his family (as he did with the Court's permission in late 2010) on the dates indicated below, and to regain possession of his passport for the duration of his trip. The government, through Assistant United States Attorney Daniel Goldman, Angel Matos, Mr. Tahir's Pre-Trial Services Officer in New Jersey, and Regina Joyner, Supervisor of Pre-Trial Services in the Southern District of New York, consent to this request.

Mr. Tahir's proposed itinerary is as follows:

- August 16, 2012: Mr. Tahir will retrieve his passport from pre-trial services.
- August 17, 2012: Mr. Tahir will drive with his wife, Nighat, and daughter, Narish, to visit his wife's brother, Munsab Ali, his wife, and his three children at their home located at 3120 Angelpass Drive, Mississauga, Ontario, L5M, Canada. Mr. Tahir and his family will remain in Mississauga, Ontario, until August 22, 2012.
- August 26, 2012: Mr. Tahir will drive back from Canada with his wife and daughter, and will return home that night.
- August 27, 2012: Mr. Tahir will return his passport to pre-trial services.



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Hon. Denise L. Cote
United States District Judge
Southern District of New York
July 27, 2012
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In addition, please note that this travel request supercedes my July 26, 2012, letter to the Court which provided different travel dates for Mr. Tahir's trip to Ontario, Canada, that are no longer accurate.

As noted above, both the government and Pre-Trial Services have consented to this revised request.

Respectfully submitted,

Joshua L. Dryatel

JLD/lal

cc: AUSA Daniel S. Goldman (By Facsimile)

Con't'd.

Denise Cote
8/1/12